



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JAM/MEM
F. #2017R00509

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 4, 2021

By Email and ECF

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Re: United States v. Karl Jordan, Jr., et al.
Criminal Docket No. 20-305 (LDH)

Dear Counsel:

Enclosed please find the government's supplemental discovery production for defendants Karl Jordan, Jr. and Ronald Washington in accordance with Rule 16 of the Federal Rules of Criminal Procedure, items Bates numbered 1356 through 1415. These items include additional ballistics reports, a supplemental crime scene report and expert witness disclosures pursuant to Fed. R. Crim. P. 16(a)(1)(G) and Fed. R. Evid. 702, 703 and

705. As with all discovery materials provided by the government that contain personal identifying information regarding specific individuals and uncharged third parties, any filings pertaining to discovery materials must comply with Rule 49.1(a) and other applicable law.

Pursuant to Rule 16(b)(1)(C), the Government reiterates its demand for reciprocal notice regarding any expert witness that any of the defendants intends to rely upon. The Government also repeats its request for reciprocal discovery under Fed. R. Crim. P. 16(b). Specifically, we request that you allow inspection and copying of: (1) any books, or copies or portions thereof, which are in the defendants' possession, custody or control, and which the defendants intend to introduce as evidence or otherwise rely on at trial; (2) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, which are in the defendants' possession or control, and which the defendants intend to introduce as evidence or otherwise rely on at trial or which were prepared by a witness whom the defendants intend to call at trial; and (3) notice of any alibi defense pursuant to Fed. R. Crim. P. 12.1(a).

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Artie McConnell
Artie McConnell
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cc: Clerk of the Court (LDH) (by ECF) (without enclosures)